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October 29, 2019

**Via ECF**

The Honorable Magistrate Judge Ona T. Wang  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: **Guajardo, et al. v. Titan Construction Services LLC, et al.**  
**19-CV-1551 (OTW)**

Dear Judge Wang:

We represent Plaintiffs in the above-matter and we submit this letter to supplement the parties' motion for approval of the settlement agreement ("the Motion") filed with the Court on October 4, 2019 [Dkt. No 53]. The settlement agreement ("Agreement") was included with the Motion as Exhibit 1.

In the Motion, Plaintiffs' counsel had indicated that one of the named Plaintiffs – Lenny Villao – was unable to execute the Agreement at the time of filing. Plaintiffs submit this letter now to advise the Court that Plaintiff Villao was able to execute the Agreement on October 25, 2019, and as such, all Plaintiffs have now executed the Agreement.

Attached hereto as Exhibit 1 is a copy of the Agreement now executed by Plaintiff Villao. The agreement is identical in all respects to the Agreement filed on October 4, 2019, except that it now includes Plaintiff Villao's signature.

In addition to the Agreement filed on October 4, 2019, the parties also filed an "Addendum to Settlement Agreement and Release" ("Addendum"). In the Addendum, the parties added provisions in the event that Plaintiff Villao did not execute the Agreement by November 15, 2019. As Plaintiff Villao has now executed the Agreement, we respectfully ask that the Court disregard the Addendum in its analysis of the fairness of the Agreement.

All parties have consented to the filing of this letter.

We thank the Court for its consideration on this matter and remain available to provide any additional information.

Respectfully submitted,

/s/  
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